

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF EASTERN NEW YORK**

MARTÍN JONATHAN BATALLA VIDAL,  
et al.,

*Plaintiffs,*

*v.*

ALEJANDRO MAYORKAS, et al.,

*Defendants.*

Civil Action No. 1:16-cv-04756  
(NGG) (VMS)

**MOTION TO WITHDRAW AS  
COUNSEL**

**MOTION TO WITHDRAW AS COUNSEL**

**PLEASE TAKE NOTICE THAT** counsel for Plaintiffs hereby move the Court for an Order, pursuant to Local Rule 1.4, to allow Mayra B. Joachin to withdraw as counsel of record for Plaintiffs in this matter as her employment with the National Immigration Law Center will conclude on March 3, 2022.

WHEREFORE, the undersigned counsel respectfully requests this Honorable Court enter an Order granting the motion to withdraw. A proposed order is attached.

Dated: March 03, 2022,

Respectfully submitted,

*/s/ Mayra B. Joachin*  
Mayra B. Joachin (SBN 306065)  
NATIONAL IMMIGRATION LAW CENTER  
3450 Wilshire Blvd. #108-62  
Los Angeles, CA 90010  
T: (213) 639-3900  
joachin@nilc.org

*Attorney for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 3, 2022 I electronically filed the foregoing Motion to Withdraw as Counsel and [Proposed] Order granting the same with the Clerk of the Court for the United States District Court for the Eastern District of New York by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Mayra B. Joachin  
Mayra B. Joachin